Generator Status Worksheet

Vehicle Maintenance and Repair Series

In order to determine whether your shop is a small quantity generator or a large quantity generator, complete the worksheet below to identify and quantify hazardous wastes now leaving your shop. See the factsheet titled " Your Generator Status" for information concerning your regulatory requirements.

Process	Traditional Practice	Waste Stream	Is Waste Hazardous? (See notes below)	Amount per Month	
				Quantity of hazardous waste	Disposal cost
Parts washing	Solvent service	Waste solvent [A]			
Coolant changing	Off-site recycling or disposal	Waste antifreeze[B]			
Brake washing	Aerosol spray cans	Waste cans[C]			
	Solvent Service	Waste solvent[D]			
Lubricating and spot cleaning	Aerosol Spray cans	Waste cans[C]			
		Used rags or paper towels[E]			
Floor cleaning	Disposable rags or paper towels	Used rags or paper towels[E]			
	Dry absorbent	Used absorbent[F]			
	Hosing with water[H]	Trap or separator sludges[G]			
	Cleaning service	Wash or mop water[H]			
Other Processes		Waste gasoline etc.			
Determine your generator status by adding up the quantity of all hazardous wastes (Multiply gallons by 8 to convert to pounds)					
Determine your monthly waste management costs for all waste streams					

[A] Waste solvents and solvent sludges are generally hazardous unless testing demonstrates otherwise.
[B] Waste antifreeze may be hazardous depending on its metal concentration. In a 1999 federal survey of sampling studies about half the waste antifreeze samples proved to be hazardous.
[C] Used aerosol cans should be disposed of in trash or recycled as scrap metal if they are completely empty. Dispose of used aerosol cans as hazardous waste if they are not empty and their contents are hazardous. Do not count empties as hazardous waste.
[D] Spent brake washing solvent is very likely to be a hazardous waste.
[E] Used rags and paper towels are very likely to be a hazardous waste if they are contaminated with gasoline or solvent. If the solvent product used contained an F-listed chemical at a 10% or greater concentration, the contaminated rags or towels will be a hazardous waste. If solvent on rags or towels is not an F-Listed chemical, use your knowledge or test the rags or towels to determine whether they are hazardous. If they are hazardous, it is illegal to dispose of in the trash. Have used rags laundered (recycled) by an industrial laundry, or dispose of them as a hazardous waste.
[F] Used absorbents soaked with waste oil are not regulated unless they are also contaminated with hazardous wastes.
[G] Sludges from traps and oil/water separators may contain heavy metals or solvents. Test sludges at least once to determine whether they contain heavy metals or solvents.
[H] Wash water or mop water is generally not counted as a hazardous waste. However, if wash or mop meets the criteria for a hazardous waste, it may not be placed in a sanitary sewer. Even if it is not hazardous waste, wash or mop water must meet sewer discharge requirements limiting its oil and grease content, etc. Contact Washington Suburban Sanitary Commission for requirements at 301.206.4003.

Note: Used oil, brake, transmission, and hydraulic fluids; oil filters; refrigerant from air conditioning systems; and batteries are not addressed here because if they are recycled in accordance with state and federal laws, they are not counted as hazardous wastes when determining generator status.

Calculate Your New Generator Status

After implementing as many Best Practices as possible, recalculate your waste volumes and costs.

Process	Best practice	Waste stream	Is waste hazardous? (see notes below)	Amount per Month	
				Quantity of hazardous waste	Disposal Cost
Parts washing	Aqueous spray cabinet, Ultrasonic unit, Microbial Sink-top, or Immersion unit	Waste filter [I] Waste aqueous solution[J]			
Coolant Charging	On-site or Off-site recycling	Sludges or resins[K]			
		Waste filters[L]			
Brake washing	Aqueous brake washing	Waste solution[J]			
Lubricating and spot cleaning	Refillable spray bottles	Used rags or paper towels[E]			
Floor cleaning	Spill prevention and dry cleanup methods	Used rags or paper towels[E]			
		Mop water[M]			
		Used Absorbent[N]			
Other processes		Waste gasoline,etc.			
Determine your new generator status by adding the monthly quantities of all hazardous wastes (multiply by 8 to convert to pounds).					
Estimate your new monthly waste disposal costs for all waste streams.					

[I] Waste metal filters should be recycled with oil filters as hazardous waste-exempt scrap metal waste; other filters should be disposed of as a hazardous waste or tested. In one study, one out of two filters tested positive as hazardous waste because of the presence of lead.

[J] Waste aqueous solution should be shipped off-site as a hazardous waste or tested. In two studies, 75 percent of waste aqueous solutions tested positive as hazardous wastes because of their lead and cadmium concentrations. Microbial solutions may last for years.

[K] Antifreeze recycling sludges or resins should be shipped off-site as a hazardous waste or tested. In a 1999 federal survey of sampling studies about half the waste antifreeze samples proved to be hazardous wastes due to metals content.

[L] Antifreeze recycling filters made of metal should be recycled with oil filters as a hazardous waste-exempt scrap metal waste; for nonmetal filters, make your determination based on your process knowledge or testing.

[M] Mop water should be nonhazardous and can be disposed of in a sanitary sewer, provided that all floor spills are first cleaned up using the 4 step dry cleanup method. If the floor drain is capped, pour the mop water into a sink or flush it down a toilet (Washington Suburban Sanitary Commission approval is required). Mop water and other waste materials should never be discharged to a storm drain, ditch, dry well, or septic system.

[N] Used absorbent should be used only to clean up gasoline or solvent spills; in emergency situations; or for clean-up of old, pitted shop floors. Test the used absorbent or use your knowledge of what was spilled to determine whether the used absorbent is hazardous. Absorbent saturated with gasoline or solvents will very likely be hazardous.

Note: Used oil; brake, transmission, and hydraulic fluids; oil filters; refrigerant from air conditioning systems; and batteries are not addressed here because if they are recycled in accordance with state and federal laws, they are not counted as hazardous wastes when determining generator status.

The information in this fact sheet was developed by the U.S. Environmental Protection Agency Region 9 pollution prevention program.